

FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division

ALEJANDRO ABRAHAM LOPEZ, JR.,  
*Individually and on behalf of all  
similarly situated individuals,*

Plaintiff,

v.

Civil Action No. 1:12-cv-902 (LO/JFA)

TRANS UNION, LLC,

Defendant.

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ALEJANDRO LOPEZ, SR.,  
*Individually and on behalf of all  
similarly situated individuals,*

Plaintiff,

v.

Civil Action No. 1:12-cv-1325 (LO/JFA)

TRANS UNION, LLC,

Defendant.

**CONSENT MOTION FOR EXTENSION OF TIME TO RESPOND TO DISCOVERY**

Trans Union, LLC, by counsel, pursuant to Local Rule 37(F), moves for an order extending the deadlines for it to respond to certain written discovery.

1. This class action case is currently pending in this Court, and the parties have been engaged in settlement discussions. On May 20, 2013, an Order was entered terminating all discovery deadlines. At the time the Order was entered, Plaintiffs' Second Interrogatories to Trans Union and Fourth Requests for Production to Trans Union were outstanding. These were

served by email on May 10, 2013. Ordinarily, the deadline for Trans Union's objections to this written discovery would be May 28, 2013, and its answers would be due June 9, 2013.

2. In consideration of this pending discovery and the May 20 Order, Trans Union moves to extend the deadline for its objections until Tuesday, June 4, 2013, and for its deadline for answers and responses to this written discovery be postponed pending further agreement of the parties on resolving this and other outstanding discovery deadlines should the case not settle.

3. No party will be prejudiced by the extension. The objections will still be completed, and the parties have agreed to negotiate the deadlines for answering discovery pending mediation.

4. The parties do not request oral argument on this Motion.

5. Trans Union has contacted Plaintiff and Plaintiff consents to the relief sought in this Motion.

6. The proposed order is attached as Exhibit A to this Motion. Separately, pursuant to the ECF Policies and Procedures, Trans Union has endorsed the order and circulated it to counsel for Plaintiff, who will endorse the order and submit the fully endorsed order to the Clerk of Court.

FOR ALL THE FOREGOING REASONS, Trans Union respectfully requests that this Court grant its Motion.

/s/ Michael R. Ward  
Michael R. Ward  
Virginia bar number 41133  
Attorney for Trans Union LLC  
Morris & Morris, P.C.  
P.O. Box 30  
Richmond, VA 23218  
Telephone: (804) 344-8300  
Facsimile: (804) 344-8359  
[mward@morrismorris.com](mailto:mward@morrismorris.com)

Paul L. Myers, *Pro Hac Vice*  
Texas Bar Number 14765100  
Attorney for Trans Union LLC  
Strasburger & Price LLP  
2801 Network Blvd., Suite 600  
Frisco, TX 75082  
Telephone: (469) 287-3903  
Facsimile: (469) 227-6567  
[paul.myers@strasburger.com](mailto:paul.myers@strasburger.com)

Stephen J. Newman, *Pro Hac Vice*  
Attorney for Trans Union LLC  
Stroock & Stroock & Lavan LLP  
2029 Century Park East, Suite 1600  
Los Angeles, CA 90067-3068  
Telephone: (310) 556-5800  
Facsimile: (310) 556-5959  
[snewman@stroock.com](mailto:snewman@stroock.com)

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the above and foregoing document has been forwarded on the 28 day of May, 2013, to all counsel of record by electronic mail and U.S. Mail as follows:

Leonard Anthony Bennett  
[lenbennett@cox.net](mailto:lenbennett@cox.net)  
Susan M. Rotkis  
[srotkis@clalegal.com](mailto:srotkis@clalegal.com)  
Consumer Litigation Assoc PC  
763 J Clyde Morris Blvd, Ste 1A  
Newport News, VA 23601

Kristi Cahoon Kelly  
[kkelly@siplfirm.com](mailto:kkelly@siplfirm.com)  
Andrew J. Guzzo  
[aguzzo@siplfirm.com](mailto:aguzzo@siplfirm.com)  
Surovell, Isaacs, Petersen & Levy, PLC  
4010 University Dr., Ste 200  
Fairfax, VA 22030

Matthew J. Erausquin  
[matt@clalegal.com](mailto:matt@clalegal.com)  
Janelle Elene Mason  
[janelle@clalegal.com](mailto:janelle@clalegal.com)  
Casey Shannon Nash  
[casey@clalegal.com](mailto:casey@clalegal.com)  
Consumer Litigation Assoc PC  
1800 Diagonal Road, Ste 600  
Alexandria, VA 22314

I further certify that I will cause a copy of the foregoing Motion and corresponding NEF by electronic mail on the following non-filing user: None.

/s/ Michael R. Ward  
Virginia bar number 41133  
Attorney for Trans Union LLC  
Morris & Morris, P.C.  
P.O. Box 30  
Richmond, VA 23218  
Telephone: (804) 344-8300  
Facsimile: (804) 344-8359  
[mward@morrismorris.com](mailto:mward@morrismorris.com)